Attorney Docket No.: Q80016

RESPONSE UNDER 37 C.F.R. § 1.116

Application No.: 10/824,434

REMARKS

Claims 1-37 are all the claims pending in the application.

Claim Rejections - 35 U.S.C. § 103

Claims 1-3, 5, 6, 22, 35, and 36 stand rejected under 35 U.S.C. 103(a) as allegedly being unpatentable over Iverson (U.S. Patent No. 6,957,075) and Zancho (U.S. Patent No. 5,814,798). Claims 4, 8-16, 18-21, and 23-34 stand rejected under 35 U.S.C. 103(a) as allegedly being unpatentable over Iverson, Zancho, and Dong *et al.* (U.S. Pub. No. 2002/0105543, hereinafter "Dong"). Claim 7 stands rejected under 35 U.S.C. 103(a) as allegedly being unpatentable over Iverson, Zancho, and Nakajima (U.S. Patent No. 7,095,456). Claim 37 stands rejected under 35 U.S.C. 103(a) as allegedly being unpatentable over Iverson, Zancho, and Miller *et al.* (U.S. Pub. No. 2003/0046557, hereinafter "Miller"). Claim 17 stands rejected under 35 U.S.C. 103(a) as allegedly being unpatentable over Iverson, Dong, Zancho, and Nakajima.

For at least the following reasons, Applicants respectfully traverse the rejection.

It was submitted in the previous Amendment filed August 25, 2008 that the combined teachings of Iverson and Zancho do not teach or suggest a UI support module operable to search the input/output module storing unit for a specific input/output module of one of the respective users, wherein the UI support module comprises an input/output module selecting unit including a mapping of each of the respective users with corresponding at least one of the stored input/output modules as set forth in claim 1 (see previous Amendment, page 15, last paragraph to page 17, first full paragraph). For instance, Iverson discloses an electronic appliance 100 which dynamically selects one of a number of interfaces depending on the current location of the electronic appliance 100. Alternatively, a user may override the dynamically selected interface

Attorney Docket No.: Q80016

RESPONSE UNDER 37 C.F.R. § 1.116

Application No.: 10/824,434

and select an interface manually. Therefore, Iverson discloses interfaces corresponding to a single user and does not disclose interfaces corresponding to multiple users. On the other hand, claim 1 recites that the stored input/output modules are selected corresponding to conditions of respective users.

In response, the Examiner now contends that "Iverson discloses that a user can define the personalities associated with a particular location ID [column 7, lines 2-5] and can also change and customize the dynamically selected personality by selecting an alternate personality [column 7, lines 9-22]. Since the appliance may be a portable computer [column 3, lines 41-441] it may have multiple users depending on its location (i.e. someone using the appliance at work and a home user) [column 1, lines 53-601. There is no restriction on which user sets up the personalities and thus, multiple users would be able to customize the personalities based on a location." (Office Action, page 41, lines 4-11, emphasis in original). That is, the Examiner is now interpreting Iverson's appliance to be programmed/customized for different personalities by multiple users based on the location of the appliance. Such an interpretation of Iverson, however, precludes its combination with Zancho.

In particular, the Examiner acknowledges that Iverson does not teach a mapping of each of the respective users with corresponding at least one of the stored input/output modules as required by claim 1 (Office Action, page 41, lines 11-13). The Examiner maintains that Zancho makes up for Iverson's deficient teachings because Zancho teaches a donor device which allegedly stores preferences of multiple users, wherein the preferences are provided to an application device upon request (Office Action, page 41, lines 13-20). The Examiner contends that "[s]ince Iverson discloses the need for adjusting a user interface and perceived functionality based on location or user [Iverson, column 2, lines 11-14] and that the system is

Attorney Docket No.: Q80016

RESPONSE UNDER 37 C.F.R. § 1.116

Application No.: 10/824,434

fully capable of allowing multiple users to customize the personalities, it would have been obvious to one of ordinary skill in the art at the time the invention was made to include a mapping of each of the respective users with corresponding at least one of the appliance personalities, as taught by Zancho....[to] allow preferences to be conveniently established for users of various devices" (Office Action, page 42, lines 4-10). Applicants disagree.

As noted above, the Examiner is interpreting Iverson's appliance to be programmed/customized for different personalities by multiple users <u>based on the location</u> of the appliance (also see Office Action, page 42, last paragraph continuing to page 43). Even assuming *arguendo* that such is the case, Iverson explicitly discloses that the user (or in the Examiner's proposed scenario, the multiple users) of the appliance 100 <u>manually</u> modifies the personality which would alter the user interface and/or application set associated with the dynamically selected personality (Iverson, col. 7, lines 9-17). Zancho's alleged mapping could not be employed in this case since the mapping inherently requires a predetermined correspondence between the user and their respective preferences. Iverson's disclosed technique for providing a location based appliance personality does not allow for such a mapping since the dynamically selected personality (based on the location) is only changed when a user manually alters the personality. That is, the altered personality is never stored in Iverson with respect to the user, which precludes creation of any mapping between the user and the altered personality.

Moreover, in this case, if a skilled artisan were to draw from the cited teachings of Zancho and incorporate them into Iverson's technique, Zancho's donor device 1230 would **necessarily predict** preferences for the application device corresponding to the user since a prestored mapping between the user and the user's preferred 'personality' would not be available in Iverson (Zancho, col. 9, lines 56-64, and col. 10, line 64 to col. 11, line 4). Such a combination

RESPONSE UNDER 37 C.F.R. § 1.116 Attorney Docket No.: Q80016

Application No.: 10/824,434

then would not lead to the claimed input/output module selecting unit which includes a mapping

of each of the respective users with corresponding at least one of the stored input/output

modules. Accordingly, Applicants submit that claim 1 is patentable over the combined teachings

of Iverson and Zancho.

Applicants further submit that the remaining independent claims 8, 13, 22, 28 and 30 are

patentable for at least reasons similar to those submitted for claim 1, and the dependent claims

are patentable at least by virtue of their dependencies.

In view of the above, reconsideration and allowance of this application are now believed

to be in order, and such actions are hereby solicited. If any points remain in issue which the

Examiner feels may be best resolved through a personal or telephone interview, the Examiner is

kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue

Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any

overpayments to said Deposit Account.

Respectfully submitted,

Registration No. 61,124

/ S. Stuart Lee /

S. Stuart Lee

SUGHRUE MION, PLLC

Telephone: (202) 293-7060

Facsimile: (202) 293-7860

WASHINGTON OFFICE

23373

CUSTOMER NUMBER

Date: January 14, 2009

5